

**Technical Review and the Evaluation of the Application  
for  
Air Quality Minor Permit Revision #46398**

**I. INTRODUCTION**

This Class I Minor Revision authorizes Phelps Dodge Morenci, Inc., dba Freeport-McMoRan Copper & Gold – Morenci (FMCGM), to replace the existing 260 tons per hour (TPH) crushing & screening plant with a new 500 TPH crushing & screening plant in the Mine Section. This crushing & screening plant provides road base and blast stemming material for use in open pit mining operations.

The new crushing & screening plant will comprise of a scalping grizzly, primary jaw crusher, triple deck screen, secondary cone crusher, stockpiles, fabric filter dust collector, and respective conveyance systems, and respective dust suppression systems.

This change meets all the requirements of a minor permit revision.

**II EMISSIONS**

With this change, the emissions of particulate matter (PM) and particulate matter below 10 micron size (PM<sub>10</sub>) will increase by 12.17 tons per year (TPY) and 4.41 TPY respectively.

**III. PERIODIC MONITORING**

No changes in the frequency of periodic monitoring are occurring as part of this minor revision.

**IV. TESTING REQUIREMENTS**

No changes in the frequency of testing requirements are being made as part of this minor revision.

**V. MINOR REVISION GATEKEEPERS**

The Department has determined that this revision meets the requirements of a minor revision. Each minor revision trigger is listed below along with a discussion of why this revision meets those triggers.

1. Does not violate any applicable requirement;

There are no changes to any of the applicable requirements as a result of the change.

2. Do not involve substantive changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

There are no changes to monitoring, reporting, or recordkeeping requirements as a result of the change.

3. Does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;

The revision does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis.

4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. The terms and conditions include:

- a. A federally enforceable emission cap that the source would assume to avoid classification as a modification under any provision of Title I of the Act; and
- b. An alternative emission limit approved under regulations promulgated under the Section 112(i)(5) of the Act.

This revision is to replace the existing 260 tons per hour crushing & screening plant with a new 500 TPH crushing & screening plant in the Mine Section.

5. Are not modifications under any provision of Title I of the Act;

The change is not a modification under any provision of Title I of the Act. The increase in actual emissions, as discussed earlier, is less than PSD Significant levels. Additionally, there are no NSPS modifications being performed as part of this project.

6. Are not changes in fuels not represented in the permit application or provided for in the permit;

There are no changes in fuels associated with this minor revision.

7. The increase in the source's potential to emit any regulated air pollutant is not significant as defined in R18-2-101;

With this change, the emissions of particulate matter (PM) and particulate matter below 10 micron size (PM<sub>10</sub>) will increase by 12.17 tons per year (tpy) and 4.41 tpy respectively. The increase in emissions is below the "significant" thresholds of 25 tpy of PM and 15 tpy of PM<sub>10</sub>. The revision does not increase the potential to emit of any regulated pollutant above the significance level as listed in A.A.C. R18-2-101(106).

8. Are not required to be processed as a significant revision under R18-2-320.

A.A.C. R18-2-320 does not require this revision to be processed as a significant revision.